

**Department of
Veterans Affairs**

Memorandum

Date: December 16, 2014

From: Director, Financial Integrity Division (52BA)

Subj: Alleged Unauthorized Contracting Document Change in IFCAP (2014-04140-BA-0194)

To: Assistant Inspector General for Audit and Evaluations (52)

Thru: Deputy Assistant Inspector General for Audit and Evaluations (52B)

1. In April 2014, VA OIG Hotline received a complaint that a contracting document (VA Form 2237, request, turn-in, and receipt for property or services; used for obligating funds) was modified in IFCAP without the knowledge of the document's initial requestor or approving official. The complainant was concerned that the transaction appeared to be performed by her when that was not the case.
2. We did not find any merit in the complainant's allegations. The complainant's lack of familiarity with IFCAP was the root cause of her complaint. She was unaware that certain IFCAP reports would have allowed her to identify who modified the Form 2237. The IFCAP system operated as designed and there was neither a circumvention of internal controls nor a loss to the VA.
3. We interviewed the VA Associate Deputy Assistant Secretary for Financial Process Improvement and Audit Readiness and an IT Specialist and found that the IFCAP Accountable Officer and Purchasing Agent have the ability to modify or split a Form 2237 into separate orders when a determination is made that the separate items should be awarded to or competed among different vendors. When a Form 2237 is split, the electronic signature of the original approving official remains, as the authority to process the request still remains with that individual. The IT Specialist provided us with the report used to document the audit trail.
4. We contacted the complainant and walked her through the IFCAP report. After examining the IFCAP report we verified that the Form 2237 in the allegation was in fact split by the Purchasing Agent. The complainant was unaware that a transaction could be split and that there is a report which contains the transaction details.
5. Accordingly, we have no recommendations for improvement and are closing this Hotline without further action. If you have questions or wish to discuss these issues, please contact me at (b) (6).

Murray Leigh
Director—Financial Integrity Division (52 BA)